

IN THE UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF OHIO, WESTERN DIVISION

ENCORE RECEIVABLE MANAGEMENT,  
INC., et al.,

Plaintiffs,

Case No. 1:12-cv-297

v.

District Judge Weber

ACE PROPERTY AND CASUALTY INSURANCE  
COMPANY, et al.,

Defendants.

STIPULATED EXTENSION OF TIME TO MOVE OR PLEAD

Pursuant to Rule 6.1 of the Local Rules of the United States District Court for the Southern District of Ohio, the parties hereby agree and stipulate that Defendant ACE Property and Casualty Insurance Company ("ACE") shall have an additional twenty-one (21) days in which to move or plead in response to Plaintiffs' complaint. ACE's new response date is May 25, 2012. There have been no prior stipulated extensions.

So stipulated:

/s/ James E. Arnold by Sabrina Haurin  
per auth. granted 04/24/12  
James E. Arnold (0037712)  
Trial Attorney for Plaintiffs  
115 West Main Street, 4th Floor  
Columbus, Ohio 43215  
Telephone: (614) 460-1600  
Telefax: (614) 469-1066  
jarnold@arnlaw.com

/s/ Michael Goodstein by Sabrina Haurin  
per auth. granted 04/23/12  
Michael Goodstein (0080476)  
Trial Attorney for Defendant ACE Property and  
Casualty Insurance Company  
One Columbus  
10 West Broad Street, Suite 2100  
Columbus, Ohio 43215-3422  
Telephone: (614) 229-3231  
Telefax: (614) 221-0479  
michael.goodstein@baileycavalieri.com

Of counsel:

Matthew J. Burkhart (0068299)  
James E. Arnold & Associates, LPA  
115 West Main Street, 4th Floor  
Columbus, Ohio 43215  
Telephone: (614) 460-1637  
Telefax: (614) 469-1129  
mburkhart@arnlaw.com

James E. Arnold & Associates, LPA  
115 West Main Street, 4th Floor  
Columbus, Ohio 43215  
Telephone: (614) 460-1600  
Telefax: (614) 469-1066

Robin L. Cohen (pro hac vice admission  
pending)  
Adam S. Ziffer (pro hac vice admission  
pending)  
Burt M. Garson (pro hac vice admission  
pending)  
Kasowitz, Benson, Torres & Friedman  
LLP  
1633 Broadway  
New York, New York 10019  
Telephone: (212) 506-1770  
Telefax: (212) 506-1800  
rcohen@kasowitz.com  
aziffer@kasowitz.com  
bgarson@kasowitz.com

Counsel for Plaintiffs

Of counsel:

Sabrina Haurin (0079321)  
Bailey Cavalieri LLC  
One Columbus  
10 West Broad Street, Suite 2100  
Columbus, Ohio 43215-3422  
Telephone: (614) 229-3253  
Telefax: (614) 221-0479

Bailey Cavalieri LLC  
One Columbus  
10 West Broad Street, Suite 2100  
Columbus, Ohio 43215-3422  
Telephone: (614) 221-3155  
Telefax: (614) 221-0479

Counsel for Defendant ACE Property and  
Casualty Insurance Company

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Stipulated Extension of Time to Move or Plead was served upon Plaintiffs through the Court's CM/ECF system this 24th day of April 2012. I further certify that I served the foregoing via first-class United States mail, postage, prepaid, this 24th day of April 2012 upon Defendants as follows.

American Guaranty and Liability Insurance Company  
c/o CSC-Lawyers Inc. Service  
50 West Broad Street, Suite 1800  
Columbus, Ohio 43215

American Guaranty and Liability Insurance Company  
1400 American Lane  
Schaumburg, Illinois 60196-1056

American Home Assurance Company  
c/o CSC-Lawyers Inc. Service  
50 West Broad Street, Suite 1800  
Columbus, Ohio 43215

American Home Assurance Company  
175 Water Street, 18th Floor  
New York, New York 10038

Continental Casualty Company  
c/o CT Corporation System  
1300 East 9th Street, Suite 1010  
Cleveland, Ohio 44114

Continental Casualty Company  
333 South Wabash Avenue, Floor 22  
Chicago, Illinois 60604

Discovery Property and Casualty Insurance Company  
c/o CSC-Lawyers Inc. Service  
50 West Broad Street, Suite 1800  
Columbus, Ohio 43215

Discovery Property and Casualty Insurance Company  
385 Washington Street  
St. Paul, Minnesota 55102

Federal Insurance Company  
c/o CT Corporation System  
1300 East 9th Street, Suite 1010  
Cleveland, Ohio 44114

Federal Insurance Company  
15 Mountain View Road  
Warren, New Jersey 07059

St. Paul Fire and Marine Insurance Company  
c/o CSC-Lawyers Inc. Service  
50 West Broad Street, Suite 1800  
Columbus, Ohio 43215

St. Paul Fire and Marine Insurance Company  
One Tower Square  
Hartford, Connecticut 06183

/s/ Sabrina Haurin  
Sabrina Haurin (0079321)